

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	Cause No. 4:05CR35
V.	§	Judge Brown
	§	
JON ADAM STANLEY	§	

ELEMENTS OF THE OFFENSE

TO THE HONORABLE PRESIDING UNITED STATES DISTRICT JUDGE FOR THE
EASTERN DISTRICT OF TEXAS:

With respect to Count Two of the Indictment:

Title 18, United States Code, Section 924(c) makes it a crime for anyone to use a firearm during and in relation to a drug trafficking crime or to possess a firearm in furtherance of a drug trafficking crime. The following are the elements of the offense that the government must prove beyond a reasonable doubt before you could be convicted:

First: That the defendant knowingly possessed a controlled substance;

Second: That the controlled substance was in fact Gamma Hydroxybutyrate (GHB), a Schedule I controlled substance;

Third: That the defendant possessed the substance with intent to distribute it; and

Fourth: That the defendant knowingly possessed a firearm, namely, a Glock, Model 19, 9mm semi-automatic handgun, Serial No. CGR070US, in furtherance of the intent to distribute the GHB.

Respectfully submitted,

MATTHEW D. ORWIG
United States Attorney

/s/
JOHN L. RATCLIFFE
Assistant United States Attorney

Certificate of Service

I hereby certify a true and correct copy of the foregoing was served by electronic filing by CM/ECF to Mr. Michael Curran, 2780 W. Virginia Pkwy, Suite 401, McKinney, TX 75071 on this the 20th day of April, 2005.

/s/

JOHN L. RATCLIFFE